

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL GLEISSNER)
vs.) Civil Docket No. 15-cv-9162-ER
Plaintiff)
AIR CHINA AIRLINES LIMITED)
Defendant)

PLAINTIFF'S COUNSEL MOTION TO WITHDRAW

Counsel for the Plaintiff, BIGFOOT VENTURES, LLC (BIGFOOT), Philip R. Berwisch, Esq. (BERWISH), of Berwisch Law, 112 West 34th Street - 18th Floor, New York, NY 10120, formally moves this Honorable Court for leave to withdraw as counsel of record in this matter. In support hereof, BERWISH states the following:

- 1] The Agreement by which BERWISH represented the Plaintiff has been terminated.
- 2] Consequently, counsel cannot properly take any further action in this matter without being in conflict with the terms of the Agreement and the termination of representation.
- 3] The only hearing held in this matter, to date, was the initial scheduling conference held on March 10, 2016. Therefore, the Defendant, Air China Airlines Limited (AIR CHINA) will not be prejudiced.
- 4] There are no motions pending.
- 5] Counsel requests the Plaintiff, Michael Gleissner (GLEISSNER) be afforded no less than thirty (30) days in which to secure successor counsel.

WHEREFORE: Philip R. Berwisch, counsel of record for the Plaintiff in the above referenced matter, prays this Honorable Court for leave to withdraw as counsel of record in the instant action, that Plaintiff, Michael Gleissner, be afforded no less than thirty (30) days in which to secure successor counsel, or such other time as the Court may allow, together with such other relief as the Court deems just and proper.

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Dated: March 25, 2016
New York, NY

Respectfully submitted by,

/ s /
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*Counsel for the Plaintiff,
Michael Gleissner*